

From: [Jump, Christine](#)
To: [Michael Stephenson](#); [SMITH, MARTIN L](#)
Cc: [Jacobs, Ann](#)
Subject: RE: Risk Assessment call
Date: Friday, December 12, 2014 3:53:00 PM
Attachments: [risk assessment memo.pdf](#)

Mike-

Attached is a risk assessment memo from the initial review of the risk assessment submitted with the Phase IV RFI. It is very general because significant concerns were identified early in the review that we thought needed to be addressed before doing an in depth review.

EPA cannot approve the risk assessment as written; however, we recognize that conditions have changed and would like to find a way to take a practical approach to revising the document.

The risk assessment must evaluate site conditions prior to the interim remedial action.

EPA proposes doing a quantitative risk assessment evaluation of the ground water. At a minimum, there is/was a future risk to ground water, (if there was no risk, no interim measure would have been necessary) and that needs to be documented quantitatively using site data.

EPA would like to discuss how to conduct the ground water assessment, and potentially how to address soil risk' without having to recalculate everything based on the deficiencies noted in the memo since the majority of the soil has been removed.

I discussed a lot of these concepts in general with Marty during a site visit.

Let me know if you have any questions or need more information.

Chris Jump, L.G.
Waste Remediation and Permitting Branch
US EPA, Region 7
jump.chris@epa.gov
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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [<mailto:mstephenson@cameron-cole.com>]
Sent: Friday, December 12, 2014 2:21 PM
To: Jump, Christine; SMITH, MARTIN L
Cc: Jacobs, Ann

Subject: RE: Risk Assessment call

Hi Chris,

I touched based with Bruce Fishman, he would like a list of questions or discussion topics to ponder prior to scheduling a call to insure that he has sufficient time to prepare. Could you forward something over early next week and we can try to get something together for the tail end of the week? Bruce indicated that the week of Christmas was probably not a good idea, but could chat late next week or the week after Christmas.

Mike

From: Jump, Christine [<mailto:Jump.Chris@epa.gov>]

Sent: Friday, December 12, 2014 9:46 AM

To: Michael Stephenson; SMITH, MARTIN L

Cc: Jacobs, Ann

Subject: Risk Assessment call

I spoke with Ann Jacobs about scheduling a time for a call with your risk assessor. She said she was not taking much time off during the holidays and is relatively available in January. She did request that I participate on the call.

I will be off work December 24-26 and the week of January 4-9, but plan to be in the office other than those times. Have you had a chance to check with your risk assess to determine when he would be available?

Thanks.

Chris Jump, L.G.

Waste Remediation and Permitting Branch

US EPA, Region 7

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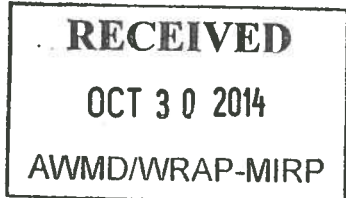
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
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OCT 28 2014



MEMORANDUM

SUBJECT: Comments on the Health Assessment for the Clean Harbors LLC Property, Wichita, KS

FROM: Ann Durham Jacobs *Ann Jacobs*
Human Health Risk Assessor
ENSV/EAMB

TO: Chris Jump
Remedial Project Manager
AWM/RCAP

As requested, we have reviewed the Health Assessment for the Clean Harbors LLC Property, and are providing our comments with respect to its influence upon risks to human health and future corrective measures decisions. Should you have any further questions, please contact Ann Jacobs at x7930.

Comments

The risk assessment has three issues which limit the ability to review the entire document thoroughly or with much confidence as to determine potential human health risks, which are outlined below:

1. The risk assessment did not address Clean Harbor's own impact upon groundwater and relied upon a previous evaluation for the entire aquifer. While existing groundwater use restrictions may be in place, institutional controls, such as groundwater use restrictions, cannot be used to eliminate a future exposure pathway. In order to determine Clean Harbor's potential contribution to ground water contamination and site risks for potential receptors, the groundwater must be quantitatively evaluated given the need to preserve future ground water use.
2. The soil data that were used for the risk assessment was incomplete and only included data from 2013 and did not include all appropriate existing soil data across all potential exposure areas. Without a complete set of all existing soil data from all potential exposure areas, it is not possible to determine baseline risk for all potential receptors onsite.
3. The risks for potential exposure to site soil were not evaluated with the most current Regional Screening Levels or most current exposure factors. Given the incomplete soil data set along with evaluations not using the most current RSLs, the current risk calculations do not reflect accurate reasonable maximum exposures for the site.